

September 21, 2015

REDACTED – FOR PUBLIC INSPECTION

Via ECFS

*WC Docket No. 12-375
Supplemental Reply Report
of Don J. Wood*

Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

Re: WC Docket No. 12-375

Dear Ms. Dortch,

Pursuant to the Protective Order issued December 19, 2013 in WC Docket No. 12-375, *Rates for Interstate Inmate Calling Services*, attached please find a redacted version of the “Supplemental Reply Report of Don J. Wood” (the “Report”). The attached Report contains Confidential Information as defined by the Protective Order, which Confidential Information has been redacted.

An unredacted copy of the Report and an accompanying cover letter are being submitted to the Secretary’s Office as a Confidential Filing, in accord with the Protective Order’s instructions.

Please do not hesitate to contact me should any questions arise concerning this cover letter or the attached.

Sincerely,

/s/ Don. J. Wood
Don J. Wood

Supplemental Reply Report of Don J. Wood

WC Docket No. 12-375

September 21, 2015

Overview

The purpose of this Supplemental Reply Report is to update my analysis of the issues set forth in the Commission's 2014 *Second Further Notice of Proposed Rulemaking* ("2014 FNPRM"), as informed by the information obtained through the 2014 Mandatory Data Collection. I have previously addressed these issues in my January 12, 2015 Expert Report, January 27, 2015 Expert Reply Report, and May 5, 2015 Supplemental Statement.¹

Recent filings by a number of ICS providers continue to illustrate an ongoing disconnect between the provider's recommendations to the Commission (particularly recommendations regarding the level and structure of any rate caps adopted for ICS services) and the cost data produced by those same ICS providers. In fact, the recommendations (and underlying rationale) of the largest ICS providers strongly suggest a scenario in which the individuals writing the comments have neglected to actually review the cost data provided by their own company (and others) in response to the 2014

¹ See Expert Report of Don J. Wood, WC Docket No. 12-375 (Jan. 12, 2015) ("Wood Jan. 12 Report"); Expert Reply Report of Don J. Wood, WC Docket No. 12-375 (Jan. 27, 2015); Pay Tel, Ex Parte Presentation, Supplemental Statement of Don J. Wood, WC Docket No. 12-375 (May 5, 2015) ("Wood Supplemental Statement").

Mandatory Data Collection. Securus, for example, has asserted that its proposed rate caps of \$0.20 per minute for prepaid/debit calls and \$0.24 for collect calls are “based squarely on the cost data”² that it produced, and further asserts that a proposed rate cap of \$0.08 per minute would not allow it to recover the costs that it incurs to provide ICS at prison locations. It has made, and continues to make, these claims in written comments even though *its own reported cost* to provide service at prison locations is \$***** per minute.³

In the recent filings addressed below, CenturyLink and Global Tel*Link (“GTL”) continue this pattern of reaching conclusions and making recommendations without fully analyzing the cost filings of ICS providers, including their own filings and/or those of directly related carriers.

CenturyLink

In its July 28, 2015 filing, CenturyLink responds to Pay Tel’s proposal for the Commission to cap ICS calling rates at prison locations at \$0.08 per minute.

Specifically, CenturyLink argues that “such a low rate cap for inmate calls from prisons

² Securus Technologies, Inc., Comments, WC Docket No. 12-375 (Jan. 12, 2015).

³ There is an emerging consensus that rate caps can, and should, be set based on the costs of debit and prepaid calls (excluding collect calls), because the percentage of collect calls is small and continues to decline. *See generally, e.g.*, Global Tel*Link, Ex Parte Presentation, WC Docket No. 12-375 (Aug. 10, 2015) (“GTL Aug. 10 Ex Parte”) (presentation and supporting analysis of Economists Incorporated addressing only prepaid and debit calls, excluding analysis of collect calls); Pay Tel, Ex Parte Presentation, at 1-2, WC Docket No. 12-375 (Aug. 13, 2015). If collect calls are excluded, Securus’ own reported cost to provide ICS at prisons falls to \$***** per minute.

would be grossly unrealistic in light of the costs of providing these services” at “the vast majority” of the prison locations served by CenturyLink.⁴

The merits of CenturyLink’s claim can be evaluated using cost data provided by multiple providers in response to the 2014 Mandatory Data Collection. I first consider CenturyLink’s own reported costs. As explained in more detail in my May 5, 2015 Supplemental Statement, CenturyLink is uniquely unqualified to make claims based on its own cost analysis. CenturyLink reported results that are both fundamentally inconsistent with the structure of costs reported by all other ICS providers⁵ and that are undocumented: CenturyLink provided no cost study or supporting workpapers in support of these anomalous results. Setting aside concerns regarding the efficacy of its data, CenturyLink’s reported cost per minute to provide ICS at prison locations (excluding collect calls)⁶ is \$*****. As correctly pointed out in the analysis performed by The Brattle Group, this reported cost is based on an overstatement of capital costs (and specifically a “double counting” of interest expense).⁷ While CenturyLink does not provide sufficient cost study documentation to permit a quantification of the amount by

⁴ CenturyLink, Ex Parte Presentation, WC Docket No. 12-375 (July 28, 2015) (“CenturyLink July 28 Ex Parte”).

⁵ As noted in my May 5 Supplemental Statement, CenturyLink is the *only* ICS provider to report a higher average cost to serve prisons than to serve jails, a unique result that may arise from errors at any point in CenturyLink’s wholly undocumented cost analysis.

⁶ As noted above, collect calls represent a small – and decreasing – percentage of total ICS calls. For this reason, there is an emerging consensus that the costs used to set rate caps can, and should, exclude the cost of collect calls. For example, GTL’s August 10, 2015 *ex parte* filing, and the supporting analysis of Economists Incorporated, addresses only prepaid and debit calls (and excludes an analysis of collect calls).

⁷ See Wright Petitioners, Ex Parte Presentation, Memorandum from Coleman Bazelon and Kristin Stenerson to Lee Petro, at 4 (Aug. 14, 2015).

which its reported cost is overstated, even a modest adjustment to the reported cost casts doubt on CenturyLink's assertion that a cap of \$0.08 per minute would be "grossly unrealistic" at prison locations.

I next consider whether the costs reported by other ICS providers are relevant to an analysis of CenturyLink's claims. In order to evaluate the claim that a "\$0.08 per minute rate would be significantly below CenturyLink's costs of providing service"⁸ at "the vast majority of the prisons it serves," it is instructive to further examine CenturyLink's actual role in providing service at these locations. Attached as Exhibit DJW-1 (page 1) is a printout of the web page of CenturyLink Public Communications, Inc. ("CPCI"), which describes itself as "one of the nation's strongest, most experienced providers of inmate communications services." This page provides information to inmate families and others who may wish to set up an account in order to receive calls from an inmate at a facility served by CPCI. By clicking on the link associated with a given confinement facility, a potential customer is directed to a facility-specific page that provides the identity of, and contact information for, the underlying ICS service provider at that location.

Of the 37 locations CPCI listed, 9 appear to be prisons⁹ while the remaining 28 appear to be jails. For 7 of these 9 prison locations, the listed provider of debit and

⁸ CenturyLink July 28 Ex Parte, at 1.

⁹ For this analysis, I have treated the following as prison locations: Alabama Department of Corrections, Arizona Department of Corrections, Idaho Department of Correction, Kansas Department of Corrections, Kansas Juvenile Detention Center, Nevada Department of Corrections, Texas Department of Criminal Justice, Utah Department of Corrections, and Wisconsin Department of Corrections.

prepaid ICS is not CPCI, but IC Solutions.¹⁰ For 1 of these locations, the underlying service provider for ICS calling is Securus Technologies.¹¹ For the remaining prison location, the pages linked to the CenturyLink website do not provide the identity of the underlying carrier. For at least 8 of the 9 listed CenturyLink prison facilities, therefore, it is instructive to review the costs reported by the underlying providers (IC Solutions and Securus) to serve prison facilities. IC Solutions reports an average cost to provide ICS services at prison locations of \$***** per minute. If collect calls are excluded, the average reported cost per minute drops to \$*****. Securus reports an average cost to provide ICS services at prison locations of \$***** per minute, and if collect calls are excluded, the average reported cost per minute drops to \$*****. As a result, a cap of \$0.0800 [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]. If debit and prepaid calling services at the remaining CPCI prison location (Wisconsin Department of Corrections) are provided by IC Solutions or Securus rather than by CPCI, [REDACTED]

[REDACTED]

CenturyLink asserts in its July 28, 2015 filing that “if the Commission is to attempt to cap ICS rates, it must reflect real-world costs.”¹² CenturyLink has produced,

¹⁰ See Attached Exhibit DJW-1, at pages 2-3, for examples of CPCI’s references on its website to IC Solutions as the underlying provider of these services.

¹¹ See Attached Exhibit DJW-1, at pages 4-6, for CPCI’s references on its website to Securus as the underlying provider of these services.

¹² CenturyLink July 28 Ex Parte, at 2.

without the required documentation, with no supporting workpapers, and with no evidence to support its inputs and assumptions (or even a listing of what those inputs and assumptions might be), costs that are directly at odds with those produced by all other ICS providers (including but not limited to those ICS providers who produced a complete cost study and supporting workpapers). By any definition, CenturyLink's reported costs fail the "real-world" reliability test. Fortunately, it is possible to consider the reported costs of the ICS providers listed by CPCI as the underlying providers of debit/prepaid services at its prison locations. These costs, *without exception*, fully support a rate cap of \$0.0800 for ICS at prison locations.

Global Tel*Link

In its August 10, 2015 ex parte, GTL addresses the quality of the cost data submitted through the 2014 Mandatory Data Collection process, whether it is sufficiently reliable for the Commission to establish rate caps, and how the results should be used. I agree in part, but disagree in part, with GTL's assertions.

The Reliability of the "Best Data Available"

GTL notes that "there have been questions as to the reliability of the cost data submitted by ICS providers," but claims that "perceived variations" or "inconsistencies" in the way these costs are reported do not make all of the cost data inherently suspect.¹³

¹³ GTL Aug. 10 Ex Parte, at 3.

It is undeniable that legitimate questions have been raised regarding the reliability of the cost data produced by some ICS providers, and I have advocated for a data collection process based on standardized workpapers and complete documentation that would improve the reliability of data collected in any subsequent Commission investigations.¹⁴ As ultimately produced, the quality of the 2014 Mandatory Data Collection cost filings (and documentation, if any was produced by a given ICS provider) varied significantly, though as I noted in my January 12, 2015 Report the filings of eight ICS providers represent cost data that can be relied upon to set rate caps for ICS services.¹⁵

While I agree that the existing cost record in this proceeding is of sufficient quality to permit the Commission to establish cost-based rate caps for ICS, I strenuously disagree with any suggestion that all of the cost data submitted was of equal quality and should be given equal weight. GTL asserts that “the ICS cost data represents ‘the best underlying data available that can be verified by the interested parties and the Commission’ with ‘all data, formulas, and other aspects of the models’ being made ‘available to other parties for their evaluation’.”¹⁶ In fact, Pay Tel is the *only* ICS provider whose data submission meets the standard cited by GTL (a cost study that is verifiable because “all data, formulas, and other aspects of the models” are made available to the Commission and other parties). Securus did produce supporting

¹⁴ Pay Tel, Comments Responding to Proposed Data Collection Regarding the Commission’s Inmate Calling Services Order, WC Docket No. 12-375 (May 19, 2014).

¹⁵ Wood Jan. 12 Report, at 14-16.

¹⁶ GTL Aug. 10 Ex Parte, at 3.

workpapers for its analysis,¹⁷ but no other ICS provider came close to the standard cited above. GTL, as a large ICS provider with ample resources to conduct – and produce – a complete cost analysis, illustrates the shortcomings of the industry’s response to the 2014 Mandatory Data Collection. On behalf of an “interested party” seeking the “verification” of GTL’s reported costs, I requested a confidential copy of GTL’s filing and supporting documents. GTL responded with a *paper copy* of its populated data collection template and a brief, high-level verbal description of its general approach, but did not produce *any* “data, formulas, and other aspects of the models” purportedly used to generate the results on its populated data collection template. The confidential data provided by other ICS providers was similarly lacking.

If the appropriate standard, as GTL asserts, is “the best underlying data that can be verified by interested parties and the Commission,” then only the Pay Tel filing meets the applicable standard. In order to base ICS rate caps on a broader data set, the Commission should consider the cost filings of additional ICS providers (as explained in detail in my January 12, 2015 Report), but the weight afforded to each ICS provider’s reported costs should be a function of the quality of that provider’s cost filing, and particularly the ability of “interested parties and the Commission” to verify the accuracy of the reported costs based on “all data, formulas, and other aspects of the models” used to calculate the reported costs.

¹⁷ As explained in the August 14, 2015 *ex parte* of the Martha Wright Petitioners, important questions regarding the calculation of capital costs by Securus remain undocumented.

The Proper Use of the “Best Data Available”

GTL then turns to the question of how the cost filings should be used to establish rate caps for ICS. GTL cites to two possible extremes: establishing rates (or rate caps) based on an overall “industry wide average” or based on the “costs of each company” at “all of the locations” served by that provider.¹⁸ After noting – correctly – that “agency ratemaking does not ‘require that the cost of each company be ascertained and its rates fixed with respect to its own costs’,”¹⁹ GTL asserts – incorrectly – that the only available option is the use of “industry-wide averages” with no consideration of alternative degrees of disaggregation at a level higher than “individual company” but lower than “all industry.” Based on this demonstrably false dichotomy, GTL claims that the only relevant cost measure is the “combined average cost per minute across carriers, facility types, and call arrangement types.”²⁰

Based on this greatest possible degree of averaging, GTL points to an average-average-average cost²¹ of \$0.15 per minute²² calculated by Economists Inc. as the sole legitimate basis for an ICS rate cap. GTL’s position is undermined by both the cited language of the Commission and the record in this case. GTL cites to a conclusion by the

¹⁸ See, e.g., GTL Aug. 10 Ex Parte, at 4.

¹⁹ GTL Aug. 10 Ex Parte, at 4.

²⁰ GTL Aug. 10 Ex Parte, at 2.

²¹ I am using the term “average-average-average” to refer to GTL’s process of averaging across all providers, all facility types, and all call types, even though the information produced on the Commission’s Mandatory Data Collection template does not require that results be averaged in any of these three ways.

²² GTL Aug. 10 Ex Parte, at 2. Even if only “industry-wide averages” were properly considered, GTL does not explain how an average-average-average cost of \$0.15 supports a rate cap greater than this amount, yet it continues to propose rate caps of \$0.20 and \$0.24 per minute.

Commission that it “has unquestioned authority and wide discretion to prescribe multi-carrier rates of return for *geographic or other logical groups* in a regulatory environment”.²³ As Commission precedent and GTL’s own argument clearly show, the Commission is not tied to either extreme (i.e., the use of individual company/individual location-specific costs or the use of industry-wide average costs), but instead can establish cost-based rates (or rate caps) based on “other logical groups.”

The record in this proceeding demonstrates that the existence of such “other logical groups” is undeniable. The Mandatory Data Collection template was designed to collect costs specific to facility types (jails versus prisons) and facility sizes (based on defined ADP tiers). As explained in detail in my January 12, 2015 Report, the costs reported by ICS providers – including GTL – reveal significant differences in the costs incurred to provide ICS at jail facilities as compared to prison facilities, as well as significant differences in the costs incurred to provide ICS at facilities of different sizes.²⁴ ICS providers that serve both jails and prisons report costs to serve jails that are approximately twice the cost they report to provide ICS at prison facilities (individually, GTL reports that its cost to serve jails is ***% higher than its cost to serve prisons). All of these providers, including GTL, also consistently report differences in cost based on facility size. GTL cannot, and the Commission should not, ignore these “logical groups” whose existence is fully supported by the cost record in this proceeding. Cost-based rate

²³ GTL Aug. 10 Ex Parte, at 5 (internal citation omitted) (emphasis added).

²⁴ Wood Jan. 12 Report, at 14-28.

caps must instead fully reflect demonstrated differences in cost based on these “logical groups.”

CenturyLink Public Communications Portal

CenturyLink Public Communications Inc.

CenturyLink Public Communications Inc. (CPCI) is one of the nation's strongest, most experienced providers of inmate communication services, serving over 250,000 inmates nationwide. Our customers are friends or relatives of inmates, their attorneys, and bail bondsmen who receive calls from the inmates.

CPCI provides account management services to customers accepting calls from the following facilities:

- [Alabama Department of Corrections](#)
- [Arizona Department of Corrections](#)
- [Charleston County, SC](#)
- [Charleston County Juvenile Detention Center, SC](#)
- [City of Las Vegas, NV](#)
- [Clark County, NV](#)
- [Cole County, MO](#)
- [East Baton Rouge Parish Sheriff's Office, LA](#)
- [Escambia County, FL](#)
- [Foley, AL](#)
- [Fort Worth, TX](#)
- [Hernando County, FL](#)
- [Hillsborough County, FL](#)
- [Idaho Department of Correction \(IDOC\)](#)
- [Jackson County Jail, MO](#)
- [Johnson County, KS](#)
- [Kansas Department of Corrections](#)
- [Kansas Juvenile Detention Center, KS](#)
- [Larned Hospital, KS](#)
- [Leon County, FL](#)
- [Lenoir County Jail, NC](#)
- [Milwaukee County Jail, WI](#)
- [Milwaukee County House of Correction](#)
- [Nevada Department of Corrections](#)
- [Okeechobee County, FL](#)
- [Pasco County, FL](#)
- [Platte County Inmate Calling Center](#)
- [Putnam County, FL](#)
- [Robertsdale, AL](#)
- [Sand Ridge Secure Treatment Center, WI](#)
- [Salt Lake County, UT](#)
- [Sumter County, FL](#)
- [Texas Department of Criminal Justice](#)
- [Utah Department of Corrections](#)
- [Walton County, FL](#)
- [Wisconsin Department of Corrections](#)
- [Wisconsin Resource Center, WI](#)

8/19/2015

CenturyLink Public Communications Portal

CenturyLink Public Communications Portal

Contact Us

For more information about Collect account or setting up a Collect account to receive calls from an inmate, contact us at:

CPCI
Mailstop: NC01250106-120
143 North Washington Street
Rocky Mount, NC 27801
Live Agent phone 1-888-664-7839
Email: CPCI@centurylink.com

For more information about available prepaid or debit account types, or setting up an account to receive calls from an inmate, contact ICSolutions at:

Inmate Calling Solutions
2200 Danbury St.
San Antonio, TX 78217
Live Agent phone 1-888-506-8407
customer@icsolutions.com

CenturyLink Public Communications Portal

Welcome to the NDOC Inmate Calling Center

This site provides information on how to receive calls from inmates at the Nevada Department of Corrections (NDOC).

The NDOC has contracted with CenturyLink to provide calling and account billing services to inmates. Recipients of these calls may include friends, relatives, and attorneys.

CenturyLink's services incorporate The ENFORCER® inmate calling platform and related payment systems provided by Inmate Calling Solutions (ICSolutions). The ENFORCER enables each inmate to place paid telephone calls to up to 20 different phone numbers. To optimize the inmate calling experience, the ENFORCER combines security, fraud control, and regulatory compliance benefits with innovative calling plans and payment options.

Friends or family can fund calling accounts using a direct-dial "voice response" (IVR) number, a web-based portal, or by contacting Customer Support agents. Called parties can make payments directly to an inmate's calling account, or take advantage of a Prepaid Collect calling plan to accommodate calls to cell phones or accounts with credit issues.

Available Services

- **Collect account**
 - Set up through CenturyLink; calls are billed to you through your local phone company
 - Call **888-664-7839**
- **Prepaid Collect account**
 - Set up and funded through ICSolutions; enables you to receive calls to your specific phone number from an inmate
 - Call **888-506-8407** or access <https://icsonline.icsolutions.com/icsonline/welcome.aspx>
- **Inmate Debit account**
 - Set up and funded through inmate banking services. Inmates can use money in their inmate banking account to purchase debit calling time through the Inmate Store.
 - Access at <http://www.doc.nv.gov/?q=node/48>
- **Direct bill account (Attorney and Bail bondsman only)**
 - Set up through ICS; calls billed directly to Attorneys and Bail Bondsman only
 - Call **800-464-8957**

Restrictions


The following restrictions may be applied by the NDOC to inmate calling:

- Limits on length of calls or calling availability hours
- Limits on number of inmate calls or total monthly call minutes
- Call monitoring, recording, and inmate voice validation (in order to place calls)
- Blocks on types of phone numbers (such as 800 numbers) or selected phone numbers
- Temporary or permanent denial of phone usage rights based on disciplinary problems, gang affiliations, or requests by a called party


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Texas Offender Telephone Friends and Family - FAQ

no



TEXAS OFFENDER TELEPHONE Friends and Family Enrollment

[Home](#) [Registration](#) [Attorney Info](#) [Rates](#) [Telephone Account Refund](#) [FAQs](#) [Contact Us](#) [About Us](#)  [En Español](#)

Frequently Asked Questions

Registering my phone number to receive offender phone calls

- Why do I have to register to receive calls?** Texas Department of Criminal Justice has adopted a validation process that requires offender friends & family members to register their landline phone numbers prior to the offender being allowed to make calls. This action stems from TDCJ's commitment to providing public safety and protecting victims of crime.
- How do I register to receive calls from a Texas offender?** Please see our [Registration Requirements](#) page.
- Can you mail, fax or email me the registration form?** At this time, you can enroll by completing the form online or by calling 1-866-806-7804 for an automated registration method. Please be sure you call in from the phone you wish to register.
- How long will it take for me to get registered and be able to accept a call from an offender?** Provided conditions are met, you should be registered within one week of the time we receive your online registration or your automated registration received via the 1-866-806-7804 number.
- How will I know when I'm enrolled?** You will receive an email or recorded message to notify you when you are approved.
- How can I check the status of my enrollment?** You may call our toll free number at 1 866-806-7804, option 1, 0 to speak with a representative or send an email from the [Contact Us](#) page.
- What if I need to register for more than one offender?** You will need to register for each offender.
- How does the offender know that I am registered and that he/she can call me?** The offender can now listen to their list of approved numbers. You don't have to do anything but wait for them to call you.
- What if I move and/or my address changes?** Please contact Securus' SCBS Customer Support Center at 1-800-844-6591 to update or correct your billing information.
- What if my phone number changes?** If your phone number changes, you will need to call us at 866 806 7804, option 1, 0 to speak with a representative.
- Can I register more than one number?** Yes.
- Can I register my cell phone?** Yes, you can register a postpaid cell phone. Prepaid cell phones are not allowed. Please read the rules for cell phone registrations at the following link: <http://www.texasoffenderfriendsandfamily.com/cellphone.asp>

Billing and Service Questions

Please note: You must first successfully register to receive offender calls before calling Securus Correctional Billing Services (SCBS), the billing agent for TDCJ. Please do not call SCBS prior to confirming your registration as they will unfortunately not be able to help you.

- How can I pay for calls?** There are three ways to pay for calls from an offender housed in a TDCJ facility:
 - Direct-Collect Billed** – You will receive a monthly invoice detailing your calls. This account will be automatically created when you register with the CenturyLink Friends and Family Enrollment Center. You accept the call charges when the offender calls you.
 - Friends and Family Prepaid** – The owner of the telephone number prepaids for service. After your telephone number is registered and validated, you can deposit money in your prepaid account to begin receiving calls. Securus Correctional Billing Services (SCBS) or JPay can assist you with funding your prepaid account. You may contact SCBS at 1-800-844-6591 or JPay at JPay.com or 1-800-574-5729.
 - Offender Telephone Account** – You can deposit money into the Offender's Telephone account. You do not need to be on the Offender's Visitor List to deposit funds in an offender's account; however, funds placed in offender accounts become the property of the offender. Friends and family members will not be able to request refunds from these accounts.

There are two methods of depositing money in your prepaid account or the offender's Telephone account.

 - Contact Securus Correctional Billing Services (SCBS) Support Center at 1-800-844-6591 or visit the SCBS web at www.securustech.net/tdcj/ or
 - Contact www.JPay.com or 1-800-574-5729.

<http://texasoffenderfriendsandfamily.com/faqs.asp>

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Texas Offender Telephone Friends and Family - FAQ

2. **Why does my bill say "SCBS on behalf of CenturyLink"?** For customers receiving calls from offenders at any TDCJ facility, CenturyLink Payphone Services, Inc. utilizes Securus Correctional Billing Services (SCBS), a division of Evercom Systems, Inc., to provide billing and collection services on its behalf.
3. **What if I move and/or my address changes?** Please contact Securus Correctional Billing Services (SCBS) Customer Support Center at 1-800-844-6591 to update or correct your billing information.
4. **I currently have a landline service which does not offer the option for collect calls. Do I still register if I am not paying for the calls?** Yes, you have to register in order to receive calls from the offender, regardless of the payment method. To register please go to the [CenturyLink Registration page](#) and follow the instructions.
5. **Why can't offenders make international calls if the called party is paying for the call?** At this time the Texas Department of Criminal Justice Policy does not permit international calls. If that decision changes in the future it will be posted on the [TDCJ's website](#).
6. **Once I'm registered who do I call to put money on my account?** You don't have to take any action if you want to be direct billed. If you wish to prepay for phone calls, you can fund the prepaid account directly through Securus Correctional Billing Services (SCBS). You may also use [www.JPay.com](#), whom you may already use with transfers into offenders trust accounts.
7. **Can I get a refund on my prepaid account?** If you have questions about your JPay account call 1-800-574-5729, or email [Support@jpay.com](#). If you have questions about your SCBS account, call 1-800-844-6591 or visit Securus Correctional Billing Services (SCBS) website at [www.securustech.net/tdcj](#).
8. **What if I want to block my number from accepting calls?** Call Securus Correctional Billing Services (SCBS) support personnel and request a block on your phone. SCBS can be reached at 1-800-844-6591.
9. **What should I do if there is fraudulent activity on my account?** If you need to speak to Securus Correctional Billing Services (SCBS) support personnel to report any fraudulent activity, they can be reached at 1-800-844-6591.
10. **How can offenders fund their Offender Telephone Account?** To use this account the offender must have money in their trust account. Offenders can purchase debit time at the commissary just like other goods, using money from their trust account. To fund an offender's trust account go to tdcj's commissary trust website at [http://www.tdcj.state.tx.us/documents/Deposit_Options_Flyer.pdf](#).
 1. All applicable taxes and fees for debit purchases will be deducted by TDCJ at the point of sale
 2. To use funds from this account, offenders must choose the Telephone option
 3. Offenders will hear their remaining balance prior to initiating any Telephone calls
11. **How can friends and family members fund an Offender Telephone Account?** Anyone can fund an Offender Telephone Account. There are two options. Fees and taxes may apply. Funds placed in Offender Telephone Account become the property of the offender. Friends and family members will not be able to request funds from these accounts.
 1. Securus Correctional Billing Services, SCBS [www.securustech.net/tdcj](#).
 2. Jpay, [www.JPay.com](#)
12. **I have questions about my bill.** If you have questions about your JPay account, please call us at 800-574-5726, or email [Support@jpay.com](#). If you have a question about your bill that is not related to JPay, please contact Securus Correctional Billing Services (SCBS) support personnel at 1-800-844-6591.
13. **How do I avoid being disconnected once I receive a call from an offender?** To communicate by telephone with an offender at a TDCJ facility, you need a touch-tone phone. There are additional security reasons that could cause a disconnection. To assure your call is not disconnected do not:
 1. Attempt to make 3-way call
 2. Transfer a call
 3. Put the call on hold
 4. Use the Call Waiting feature on your phone
 5. Use a cordless phone
14. **I have a rotary dial telephone. How can I accept an offender call if I don't have a touch-tone telephone?** To avoid interruptions in service, we strongly suggest customers use a touch tone telephone, along with touch tone service from their local telephone provider. If touch tone service is not available, customers with rotary service must first register their telephone number with Securus Correctional Billing Services (SCBS) by calling 1-800-844-6591 and agree to accept and pay for all calls without the need to provide standard positive acceptance via touchtone. This registration process allows rotary dial customers to enroll in the "passive acceptance" optional feature. When calling SCBS you must provide both your telephone number AND the offender ID number (s) from whom you wish to receive calls. Please note that this is a special request and can take up to 14 days to process.
15. **My phone has a block on it. Can you help me?** There are multiple reasons why your phone may be blocked. Securus Correctional Billing Services (SCBS) support personnel can assist you at 1-800-844-6591.
16. **What if I accept a call that was prematurely disconnected?** Please call Securus Correctional Billing Services (SCBS) Customer Support Center to report a premature disconnection. You can reach SCBS at 1-800-844-6591.
17. **How do I report a problem regarding CenturyLink, Securus Correctional Billing Services, or Jpay directly to the TDCJ?** Complaints about the vendor's service should be forwarded in writing to:

Texas Department of Criminal Justice
Information Technology Division
Offender Telephone System Contract Manager
P.O. Box 4016
Huntsville, TX 77342-4016

NOTE: The Texas Department of Criminal Justice can only address complaints regarding offenders in its custody.

8/19/2015

Texas Offender Telephone Friends and Family - FAQ

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